

*Gary Spraker*

Honorable Gary Spraker  
United States Bankruptcy Judge



Entered on Docket  
July 28, 2022

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Attorneys for Christina W. Lovato, Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA**

In re

DOUBLE JUMP, INC.

Debtor.

Lead Case No.: BK-19-50102-gs  
(Chapter 7)  
Substantively Consolidated with:

19-50130-gs	DC Solar Solutions, Inc.
19-50131-gs	DC Solar Distribution, Inc.
19-50135-gs	DC Solar Freedom, Inc.

1 CHRISTINA W. LOVATO,  
 2 Plaintiff,  
 v.  
 3 KING SOLARMAN, INC., et al.,  
 4 Defendants.

Adversary No.: 21-05028-gs

**AGREED ORDER ESTABLISHING  
 DISCOVERY PLAN AND SCHEDULING  
 ORDER**

**Hearing Date: N/A**  
**Hearing Time:**

8 The Court having reviewed the pleadings on file, having been apprised of the agreement  
 9 between Plaintiff, Christina W. Lovato, chapter 7 trustee ("Plaintiff") and Defendants, King  
 10 Solarman, Inc. and Chiang Lian Cung a/k/a Michael Cung (together, "Defendants"), having  
 11 considered the presentations of counsel at the June 9, 2022 Status Conference, and for good  
 12 cause appearing,

13 IT IS ORDERED that the Court adopts the Scheduling Order, as follows:

14 1. Pre-Discovery Disclosures. The parties have already made initial disclosures  
 15 pursuant to Fed. R. Civ. P. 26(a)(1).

16 2. Discovery Plan. The parties jointly propose to the court the following discovery  
 17 plan:

- 18 a. Discovery will be needed on all matters within the scope of F.R.C.P. 26(b).
- 19 b. Fact discovery commenced in time to be completed by February 28, 2023.
- 20 c. Supplementation under Rule 26(e) due March 20, 2023.
- 21 d. All discovery shall be governed by the Federal Rules of Civil Procedure, as  
       made applicable by the Federal Rules of Bankruptcy Procedure.
- 22 e. Disclosure of expert testimony under Rule 26(a) due from Plaintiff and from  
       Defendants by March 27, 2023.
- 23 f. Expert discovery commenced in time to be completed by May 1, 2023.

24 3. Other Items.

- 25 a. Plaintiff will be allowed until January 4, 2023 to join additional parties and  
       until January 4, 2023 to amend the pleadings.

- 1 b. Defendants will be allowed until January 4, 2023 to join additional parties and  
2 until January 4, 2023 to amend the pleadings.
- 3 c. The parties shall mediate by April 3, 2023.
- 4 d. All potentially dispositive motions must be filed by May 18, 2023.
- 5 e. The parties request a pretrial conference in June 2023.
- 6 f. Final lists of witnesses and exhibits under Rule 26(a)(3) will be due from  
7 Plaintiff and from Defendants seven days prior to the pretrial conference.
- 8 g. Parties shall have ten (10) days after service of final lists of witnesses and  
9 exhibits to list objections under Rule 26(a)(3).
- 10 h. The case should be ready for trial by July 1, 2023 and at this time, the trial is  
11 expected to take approximately three days.
- 12 i. The parties do not request a conference with the Court before entry of this  
13 Order.
- 14 j. The parties request a status conference on August 11, 2022 and will endeavor  
15 to schedule a status conference every 45 days thereafter.
- 16 k. This Order supersedes any prior scheduling order entered in this Adversary  
17 Proceeding.
- 18 l. The Parties shall meet and confer if any other orders, statements, or directives  
19 issued by the Court alter, affect, or relate to this Order.
- 20 m. All deadlines in this order are agreed to and entered subject to a motion to  
21 modify such deadlines under the Federal Rules of Civil Procedure.

22 Respectfully submitted by:

23 **HARTMAN & HARTMAN**

24 /s/ Jeffrey L. Hartman

Jeffrey L. Hartman, Esq., Attorney for Plaintiff

25 **MELAND BUDWICK, P.A.**

26 /s/ Meaghan E. Murphy

27 Meaghan E. Murphy, Esq., Attorney for Plaintiff

1           **DIEMER & WEI, LLP**

2           /s/Kathryn S. Diemer

3           Kathryn S. Diemer, Esq., Attorney for Defendants

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